

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MICHAEL GRECCO PRODUCTIONS,
INC.,

Plaintiff,

v.

VALUEWALK, LLC, et al.,

Defendants.

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: CIVIL ACTION NO.
: 1:16-cv-06171-GHW
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**DECLARATION OF MICHAEL GRECCO IN SUPPORT OF
PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT**

MICHAEL GRECCO hereby declares the following to be true under penalties of perjury:

1. I am a professional photographer and President of Michael Grecco Productions, Inc. (“MGP”).

2. I registered MGP’s copyright in the image of Jeffrey Gundlach (the “Gundlach Image”) as part of registration No. VAu 1-058-559.

3. MGP did not grant ValueWalk, LLC (“ValueWalk”) any right, permission, or license to make any use of the Gundlach Image.

4. My assistant Mykle Parker and I downloaded the Wayback Machine copies of the ValueWalk website attached as Exhibits 16, 24, 25, and 26 to MGP’s motion for partial summary judgment before ValueWalk obstructed access to the Internet Archive’s archived copies of the website.

5. Pursuant to 28 U.S.C. §1746, I declare under penalties of perjury that the foregoing is true and correct to the best of my personal knowledge and belief.

Dated: June 19, 2017



Michael Grecco